



FAA-01-11032-40

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DEPT OF TRANSPORTATION

**FROM**  
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**DATE**  
27 March 2002

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**OUR REFERENCE**  
**EAA 412.0118/02**

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Docket Management System  
Docket No. **FAA-2001-11032**  
U.S. Department of Transportation  
Room Plaza **401**  
400 Seventh Street, SW.  
Washington, DC **20590-0001**

Subject: Comments to Docket No. **FAA-2001-11032**, FAR Amendment No. **25-106** and **121-288**,  
Security Considerations in the Design of the Flightdeck on Transport Category Airplanes

Dear Madam/Sir,

Airbus thanks the FAA for the opportunity to comment on the recent FAR Amendments **25-106** and **121-268**, regarding Security Considerations in the Design of the Flightdeck on Transport Category Airplanes.

We support this rule, and are fully committed to provide our customers with compliant and cost-efficient solutions in the required timeframe. With this regard, we want to clarify that the estimated labor and aircraft downtime costs, as mentioned in the ATA comments submitted on March **20, 2002**, were preliminary data for Airbus aircraft. These estimates are under review, and the final ones will be made available to our customers very soon.

We also support advisory circulars **25.795-1** and **25.795-2**, which provide useful guidance on methods of compliance with the flightdeck door design requirements.

The new paragraph **121.313(j)(2)** requires each operator to "establish methods to enable a flight attendant to enter the pilot compartment in the event that a flightcrew member becomes incapacitated." Although the rule preamble gives some explanation, we believe that an advisory circular is urgently needed on handling of the flightdeck door by both cockpit and cabin crew, not only in emergency cases, but also in routine operations.

Yours sincerely,

Hermann Ganz  
Vice-president, Airworthiness Standards  
Product Integrity Division